

Delaware, 438 U.S. 154 (1978). While it is relatively straightforward for the Defendants to make these allegations, responding to each of these allegations often requires deeper factual explanations or analysis to put the selective allegations of intentional or reckless falsehoods into proper context.

4. The defense motion includes approximately 35 pages of attached exhibits, and includes numerous factual claims and allegations based on those exhibits. However, the motion excludes connected pages of those exhibits in the original and generally omits additional factual or evidentiary information related to those exhibits in making the *Franks* allegations. Responding to the Defendants' motion is therefore necessarily fact-intensive, as providing context and correction to factual allegations often requires more, not less, written space.

5. In order to adequately respond to the legal arguments with corrected or supplemental facts, and therefore advocate against the suppression of what essentially amounts to the United States' entire case, the United States must exceed the current page limit.

6. The United States' response is due January 2, 2023.

Counsel for the Defendants do not oppose this request. Counsel for the United States were unable to reach pro se Defendant Lucas Morton in time to obtain his position prior to the filing of this motion. Therefore, the United States assumes Mr. Morton opposes.

For the foregoing reasons, the United States respectfully request that this Honorable Court issue an order authorizing counsel to exceed the page limit on the United States' response to the Defendants' motion to suppress evidence by 22 pages.

Respectfully submitted,

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Electronically filed December 27, 2022

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I HEREBY CERTIFY that the foregoing
pleading was electronically filed, which
caused counsel of record to be served by
electronic means.

/s/

TAVO HALL